

In re Fairfield Sentry Ltd., et al., Jointly Administered Chapter 15 Cases, No. 10-13164 (BRL)

Fairfield Sentry Ltd., et al., v. Theodoor GGC Amsterdam, et al., AP No. 10-03496, Administratively Consolidated

EXHIBIT D TO MOTION FOR LEAVE TO AMEND COMPLAINTS IN CERTAIN REDEEMER ACTIONS

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)
FAIRFIELD SENTRY LIMITED, et al.,) Chapter 15 Case
Debtors in Foreign Proceedings.) Case No: 10-13164 (BRL)
FAIRFIELD SENTRY LTD. (IN LIQUIDATION), et al.,) Jointly Administered
Plaintiffs,) Adv. Pro. No. 10-03496
-against-) Administratively
THEODOOR GGC AMSTERDAM, et al.,) Consolidated
Defendants.)
This document applies to the adversary proceedings listed in Exhibit A to the Motion.)

**[PROPOSED] ORDER GRANTING FOREIGN REPRESENTATIVES' MOTION FOR
LEAVE TO AMEND COMPLAINTS IN CERTAIN REDEEMER ACTIONS**

On April 1, 2011, Kenneth Krys and Joanna Lau (the “Foreign Representatives”), in their capacities as Foreign Representatives and court-appointed Liquidators of Fairfield Sentry Limited (In Liquidation) (“Sentry”), Fairfield Sigma Limited (In Liquidation) (“Sigma”) and Fairfield Lambda Limited (In Liquidation) (“Lambda” and, together with Sentry and Sigma, the “Funds” or the “Debtors”) filed a Motion for Leave To Amend Complaints in Certain Redeemer Actions, as set forth in Exhibit A to the Motion and attached hereto. Upon consideration of the Motion and the arguments contained therein, and the Court having found sufficient cause appearing therefore, it is hereby ORDERED that:

1. The Foreign Representatives are granted leave to amend the complaints in the actions listed in Exhibit A.

2. This Order is without prejudice to any other rights or defenses of the parties, including the right of the Foreign Representatives to seek leave to file further amendments to complaints in the Redeemer Actions.

3. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation and/or interpretation of this Order.

Dated: April ___, 2011
New York, New York

UNITED STATES BANKRUPTCY JUDGE

EXHIBIT A

Schedule of Actions to Which the Proposed Order Applies

1.	Fairfield Sentry Ltd. (In Liquidation), et al. v. ABN AMRO Schweiz AG, et al.	10-03635-BRL
2.	Fairfield Sentry Ltd. (In Liquidation), et al. v. ABN AMRO Schweiz AG, et al.	10-03636-BRL